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*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

INTERNATIONAL MARKETS LIVE,  
INC., a New York corporation dba  
iMARKETSLIVE,

Plaintiff,

vs.

MATTHEW THAYER,

Defendant.

Case No.: 2:22-cv-00077-RFB-DJA

**STIPULATION AND ORDER TO FILE  
SECOND AMENDED COMPLAINT**

**FIRST REQUEST**

Defendant Matthew Thayer (“Defendant”), by and through his attorneys, and Plaintiff International Markets Live, Inc. dba iMarketsslive (“Plaintiff”), by and through its attorney, hereby submit this stipulation and order for Plaintiff to file its Second Amended Complaint.

This Court requested that the Parties provide this Court with a stipulation regarding whether they will need jurisdictional discovery on or before June 13, 2022. The Parties met and conferred several times to discuss whether they anticipate needing jurisdictional discovery and have exchanged limited information on the subject. On June 20, 2022, this Court granted the Parties first request for an additional week to allow Plaintiff to gather information regarding its jurisdictional arguments. *See* ECF No. 36. Such information was necessary before the Parties can appropriately inform this Court as to whether jurisdictional discovery will be needed. Plaintiff’s counsel later indicated that he has been unable to confirm applicable jurisdictional facts and would need an additional week to gather relevant facts. Given Plaintiff’s need for additional time, the Parties again agreed to a second stipulation for extension of time. *See* ECF No. 37. On June 27, 2022, this Court granted the Parties

second stipulation to allow Plaintiff additional time to gather information regarding its jurisdictional arguments. *See* ECF No. 38.

Since the second stipulation, Defendant has learned that its 2022 Policies and Procedures, Defendant cited to in its First Amended Complaint, do not apply to Plaintiff. The Parties thus request and stipulate that Plaintiff file and serve a Second Amended Complaint within 20 days from the date of entry of this Order. Once filed, the Parties will determine whether the Parties will need jurisdictional discovery is needed.

DATED this 8th day of July, 2022.

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McDONALD CARANO LLP

LAW OFFICES OF P. STERLING KERR

By: /s/ Jeff Silvestri

By: /s/ George E. Robinson

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*Attorneys for Plaintiff*

*Attorneys for Defendant*

IT IS SO ORDERED.

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 11th day of July, 2022.